

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF MICHIGAN**  
**SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 13-20772**  
**Hon. Gershwin Drain**

**RASMIEH YUSEF ODEH,**

**Defendant.**

**MOTION TO STRIKE PORTION OF GOVERNMENT'S MEMORANDUM  
IN SUPPORT OF GUILTY PLEA.**

NOW COMES, Rasmea Odeh, by her undersigned counsel and moves to strike all portions of the government's memorandum which alleges purported facts that the government claims it could prove at trial which are not part of the agreed factual basis for the guilty plea. The defendant denies that these "facts" are true, and despite the demands of the government, the defendant has repeatedly refused to have such claims included in any guilty plea. In support of this request the defendant states the following:

1. The guilty plea was negotiated between the parties, including the factual basis.
2. Despite repeated efforts by the government, the defendant refused to agree to any claim that Ms. Odeh was involved in any terrorist activities

or was a member of a terrorist organization.

3. There is even a pending legal question whether or not these claims are time barred by the Statute of Limitations.
4. Now, despite the agreed factual basis and the rejection of these highly prejudicial allegations, the government has placed these claims in a pleading so they can be disseminated to the media and the public as part of a bad faith, politically motivated effort to discredit and defame Ms. Odeh.
5. These claims as to what the government believes it may prove at a trial are not relevant, nor necessary to the plea agreement, nor part of the agreed factual basis for the plea that was negotiated between the parties and should be stricken from the government's memorandum.

Dated: 4/21/17

Respectfully submitted,

“s/” Michael E. Deutsch

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2017, I electronically filed or caused to be filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF filers.

/s/ Michael E. Deutsch  
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Dated: April 21, 2017